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March 12, 2015

Via ECF

The Honorable Denise L. Cote
United States District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *NCUA v. Credit Suisse Securities (USA) LLC*, No. 13-cv-6736 (DLC) (S.D.N.Y.);
NCUA v. Credit Suisse Securities (USA) LLC, No. 12-2648 (JWL-JPO) (D. Kan.)

Dear Judge Cote:

NCUA filed today a motion to compel Defendant Credit Suisse to respond adequately to NCUA's First Set of Interrogatories in the above-captioned matters. Exhibit B to that motion comprises Credit Suisse's responses to those interrogatories, which Credit Suisse designated as "Confidential" pursuant to the Master Protective Order (ECF No. 83) entered in these matters. Paragraph 9 of the MPO provides that:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

NCUA therefore respectfully requests permission to file that exhibit under seal, in accordance with this Court's Individual Practices in Civil Cases.

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Respectfully submitted,

/s/ David C. Frederick

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cc: Counsel of Record (via ECF)